

Remarks

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 12-23 are pending in the application, with claim 12 being the sole independent claim. Claims 15-22 have been withdrawn from consideration, and are sought to be reinserted into the application upon allowance of generic/linking claim 12. Claims 12-14 and 23 are currently being examined. Claim 12 is sought to be amended. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicant respectfully requests that the Examiner reconsider all outstanding rejections and that they be withdrawn.

Rejections under 35 U.S.C. § 102

Claim 12 stands rejected under 35 U.S.C. § 102(b) as being allegedly anticipated by U.S. Pat. No. 4,744,550 to Oglesbee (hereinafter, "Oglesbee"). Applicant respectfully traverses.

According to M.P.E.P., § 2131, "a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference" (citing *Verdegaal Bros. v. union oil Co. of California*, 814 F.2d 628 (Fed. Cir. 1987)). Claim 12, as amended, recites, for example "an expander coupled to the wafer chuck and configured to expand the wafer chuck without substantially expanding the wafer, such that an initial stress at an interface between the wafer and the wafer chuck is created." In Oglesbee, the expansion of the wafer chuck is

accompanied by significant simultaneous expansion of the wafer, such that the wafer breaks apart into several smaller components. Further, although an initial stress may exist between the wafer chuck and the wafer of Oglesbee, such an initial stress is not *created* by the expander. Any initial stress present prior to expansion of the wafer chuck by the expander is irrelevant to a subsequent creation of stress by expansion of the chuck. Thus, Oglesbee does not teach each and every element of claim 12, as required by M.P.E.P. § 2131. For at least these reasons, Applicant submits that claim 12 is patentable over Oglesbee. Reconsideration and withdrawal of the rejection of claim 12 is respectfully requested.

Claims 12-14 and 23 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Pat. No. 6,375,176 to Getchel *et al.* (hereinafter, "Getchel"). Applicant respectfully traverses.

As discussed above, claim 12 recites, for example "an expander coupled to the wafer chuck and configured to expand the wafer chuck without substantially expanding the wafer, such that an initial stress at an interface between the wafer and the wafer chuck is created." Such a feature is not present in Getchel. Indeed, Getchel nowhere mentions any interaction between a wafer and the wafer chuck, except that the wafer may be attached to the wafer chuck using a vacuum.

The Examiner alleges that the heater in Getchel creates an initial stress between the chuck and a wafer. The Examiner points to Figs. 9A and 11A as support for this characterization. Applicant respectfully disagrees with this characterization of Getchel. Col. 14, lines 35-45 of Getchel provide two alternatives for the wafer/chuck interface of Fig. 9A. In one alternative, the chuck surface is a non-conductive material, such as

ceramic. In this embodiment, thermal expansion of the chuck surface is inhibited, so that there is no expansion of the chuck surface relative to the wafer. In the other alternative, the wafer is coupled directly to the heater. In this embodiment, the wafer undergoes thermal expansion at the same time as the chuck. Fig. 11A further details this latter embodiment, and col. 17, lines 59-61 of Getchel indicate that heater coils are used to heat both the chuck and the workpiece (e.g., wafer). For at least these reasons, Getchel does not teach, "an expander coupled to the wafer chuck and configured to expand the wafer chuck without substantially expanding the wafer, such that an initial stress at an interface between the wafer and the wafer chuck is created." As Getchel does not teach each and every element of claim 12, as required by M.P.E.P. § 2131, Applicant respectfully submits that claim 12 is patentable over Getchel. Reconsideration and withdrawal of the rejection of claim 12 is respectfully requested.

Claims 13-14 and 23 depend directly or indirectly from claim 12. Claims 13-14 and 23 are thus patentable over Getchel for at least the reasons discussed with respect to claim 12, and further in view of their own respective features. Reconsideration and withdrawal of the rejection of claims 13-14 and 23 is respectfully requested.

As generic, linking claim 12 should be found allowable, the Examiner should now reinsert claims 15-22 into the application, and find them allowable for at least the same reasons as discussed with respect to claim 12, and further in view of their own respective features.

Conclusion

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. Applicant believes that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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